



**BACKCOUNTRY
HUNTERS & ANGLERS
ALASKA**

Mr. Frank Sherman, Supervisor
Tongass National Forest
648 Mission Street, Suite 110
Federal Building
Ketchikan, AK. 99901-6591

February 24, 2025

Submitted via <https://cara.fs2c.usda.gov/Public/CommentInput?Project=64039>

The Alaska Chapter of Backcountry Hunters & Anglers (AK BHA) works to conserve Alaska's wild public lands, waters, fish, and wildlife and to uphold the character of wilderness landscapes. On behalf of some 1700+ supporters and members statewide, AK BHA asks the U.S. Forest Service to consider member feedback submitted to BHA regarding the Tongass Forest Plan Revision as well as our organizational and partner comments.

We first want to thank the U.S. Forest Service leadership and plan revision team for their work in reviewing and compiling the information included in the draft assessment. We recognize that this is a gargantuan task and thank you for the opportunity to provide feedback and considerations for your future work on moving this plan forward.

We urge the Forest Service to support the following key priorities in the final Tongass Plan Revision:

Priorities for the Tongass National Forest Land Management Plan Revision

1. Align Forest Management with Community Values:

Southeast Alaska's economy relies on fishing, recreation, and subsistence. The revised plan should prioritize forest management strategies that support these industries and way of life for residents and communities that depend on them.

2. Protect Key Fish and Wildlife Habitat:

The Tongass sustains vital fish and wildlife populations essential to the region's culture and economy. The plan must uphold strong habitat protections for critical areas, including salmon spawning grounds and blacktail deer winter ranges. The Forest Service should continue to work with partners and state agencies to collaborate around establishing and maintaining these protections.

3. Invest in Habitat Restoration:

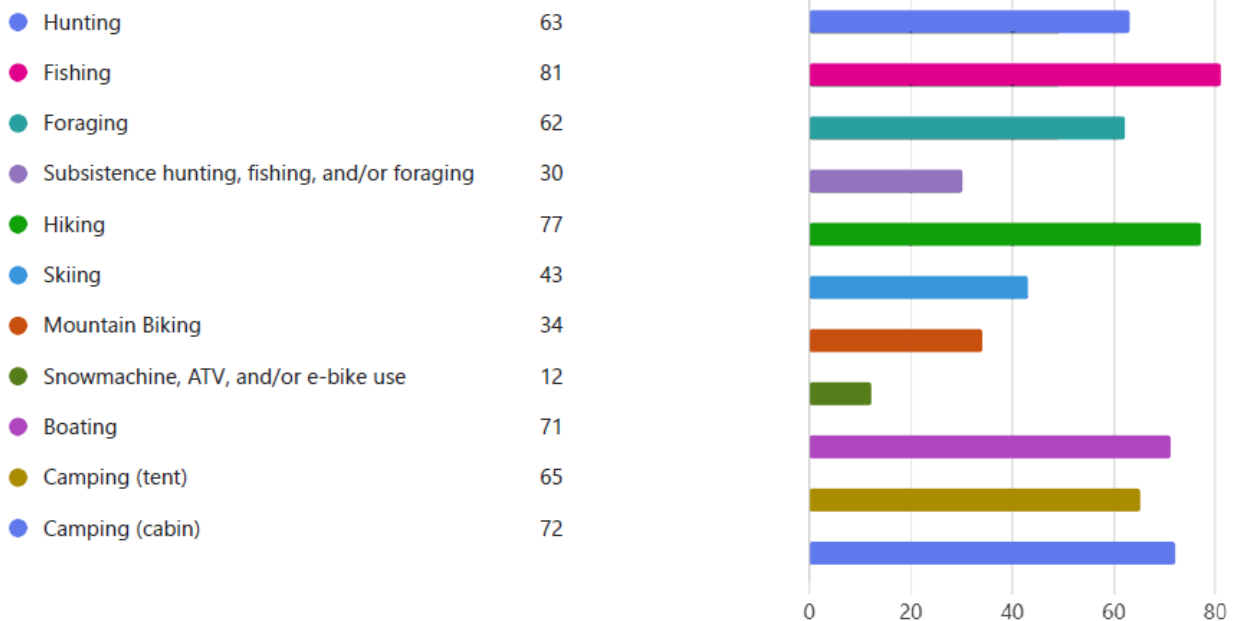
Many areas suffer from degraded fish and wildlife habitats, such as blocked salmon streams and poor deer forage in aging clear-cuts. The plan should prioritize restoration efforts to enhance flood resilience, water quality, hunting and fishing opportunities, and local economic opportunities.

4. Support for Outdoor Recreation and Tourism:

The visitor industry is one facet of Southeast Alaska's economy. The plan must address infrastructure needs, user conflicts, and capacity concerns to ensure that tourism growth remains sustainable and compatible with local recreation industries and residents.

The Tongass is a world-class destination, offering exceptional opportunities for recreation, fishing, hunting, trapping, and breathtaking scenery. It provides both local residents and tourism businesses with invaluable experiences. Residents of Southeast Alaska want to preserve these primitive recreation opportunities while ensuring a balance between non-commercial use and sustainable tourism growth.

Recent feedback solicited by Alaska BHA from our membership showed that there are a plethora of recreational uses on the Tongass, mainly by residents. Included in the top five are: Fishing, hiking, boating, tent camping, and hunting. Many of these activities occur in semi-primitive or primitive settings. Balance of these activities and the tourism industry should be considered in the plan.



Recreation types by the numbers on the Tongass National Forest. *Alaska BHA Member Feedback. 2025.*



Recreation types in order of priority on the Tongass National Forest. *Alaska BHA Member Feedback. 2025.*

“The Tongass receives approximately 2.3 million recreational visits each year. Popular activities include hiking, viewing natural features, visitor center activities, fishing, viewing wildlife, and hunting.”

Outdoor recreation users do not typically perceive boundaries with National Forest land. The Forest Service should consider how recreation infrastructure interacts with other land, trail, road, and cabin resources.

Growing tourism has led to conflicts over access to public land and changing experiences. The Forest Service has pursued voluntary agreements to reduce conflict and in recognition of the lack of regulatory authority over the waters. These voluntary agreements have not been successful at resolving the conflicts.

It could be beneficial to distinguish recreation and tourism use from a management perspective. Assess how the Forest Service is balancing, or not, recreation and tourism uses.

- Is the Tongass adequately served with recreation and tourism management resources?
- How has the Forest Service adapted to the growth and diversification of tourism across the Forest?

- What is the level of user conflict? Has there been an assessment of the number of incidences of reported user conflict and whether that has increased with the growth in the number of visitors?
- Has tourism growth affected the Forest Service's ability to provide permitting and other management services - is there a correlation to be drawn between growth and resources needed or wait times/backlog?
- How many local recreation uses versus commercial/cruise ship visitors versus independent visitors? How do the demands of these users differ? Does the Forest Service have data on what each type of visitor (cruise ship vs. independent) is looking for as their recreation experience, duration and where each goes? Is the Forest Service meeting this need through permitting and infrastructure? Are there new recreation trends these groups are looking for? How will these trends be vetted? Delineated criteria for identified trends should be discussed and established to avoid ambiguity in permitting requests and other management needs.

5. **Manage Timber Resources Sustainably:**

We support a transition to a young-growth forest products industry that prioritizes local employment and sustainable harvesting with an adherence long-term plan. The plan should integrate forest management strategies that balance restoration, thinning, and responsible timber harvesting, benefiting *both* wildlife and local economies.

6. **What AK BHA would like to see highlighted in the plan**

Distinctive differences between local recreation and tourism. The experiences are different, though the activities may be similar. The agency needs a plan for recreation and tourism that recognizes how they support each other and also how they make distinct contributions to local communities.

Rigorous economic picture of the impacts of tourism and recreation for different communities. Recreation use, Jobs, tax benefits, investment trends differ across communities. Forest Service special use permitting has implications for where the benefits of the Tongass flow. A clear understanding of how these impacts differ across communities will help inform a good plan to guide the Forest Service to benefit these communities. Assessment could recognize international travel as an export benefit.

Successes and opportunities in recreation. The agency has a lot to celebrate in this section, including partnerships with users groups, trail building groups, tribal partners, as well as being a globally-significant tourism destination. Opportunities to build new trails, ski trails. Opportunities to work with partners to enrich experience with Alaska Native

cultural interpretation, build and maintain recreation infrastructure, monitor tourism activity.

7. What We Appreciate in the Draft Assessment

Recognition of Recreation & Tourism's Importance – Acknowledging that these industries are vital to Southeast Alaska's economy and communities.

Value of Recreation to Locals & the Alaskan Way of Life – Understanding that outdoor recreation is deeply embedded in the region's culture, including traditional ways of life for Alaska Natives and rural subsistence users.

Distinction Between Recreation & Tourism Management – Recognizing that separate management approaches for these sectors will lead to a more effective and balanced plan.

Acknowledgment of Outdated Management Guidance – Agreeing that current policies need updating to reflect modern challenges and opportunities.

Recognition of the Tongass' Role in All Recreation & Tourism – Highlighting that every tourism and recreation-related job in Southeast Alaska depends on the Tongass, and ensuring the Forest Service receives due credit for its role in supporting these industries.

Emphasis on Diverse Opportunities – Understanding the need to balance non-commercial and commercial uses, as well as developed and primitive recreation, particularly in some of the most remote and wild lands within the National Forest System.

8. Vision for Recreation and Tourism Management

Prioritize outdoor recreation. Replace 2010 Leaders Intent Document with a statement prioritizing balanced recreation. The new plan needs to contemplate and prioritize the growth of demand for outdoor recreation and guided experiences as well as impact on residents.

Contemplate the distinct differences between commercial and non commercial recreation.

Address the evolution of recreation activity and the tourism industry (particularly the growth of the cruise ship industry and its traffic) and the advancement of recreation-based technology (e.g., new recreation equipment), which are changing the recreation experience. New plan should ensure the continuation of the Alaskan experience that is important to locals.

Create a forest-wide plan to respond to recreation and tourism demand, infrastructure demand. Contemplate how to meet the demand and preserve places for local use, how to use meaningful limits in space and time. Protect the culture of communities by ensuring that there are places left for local residents.

Reduce partnership barriers. Plan components should direct the Forest Service to develop projects from local input and collaboration. Develop projects collaboratively with partners across jurisdictions and with shared priorities.

Set objectives and clear metrics that capture the value that the Forest provides to the region's recreation users and tourism businesses.

Monitoring and adaptability are required activities.

Prioritize staffing and funding of recreation at the District level from new project development to caring for existing facilities. Make recreation a priority at the Districts, they are the critical link and support the local small town economies with good paying jobs.

9. Need for Change

- There is an opportunity for more interpretive information and infrastructure (including signage and information in Native languages).
- There are opportunities for more recreational trail access overall
- Need to address if access to some areas has resulted in the destruction and theft of cultural resources important to Tribes.
- There is a need to address climate change and how it is affecting all resources on the Forest.
- There is a need to address the changing seasonal and duration recreational use of the Forest and its surrounding waters.
- Increasing recreational use is leading to user conflicts, including conflicts between Indigenous populations and the general public, and voluntary segmentation of uses does not appear to be addressing the issue.
- Need to update and identify areas that should have a local use preference (but open to all), those that can accommodate higher use (carrying capacities while minimizing impacts), types of allowable uses, and areas that should be preserved due to sensitivity of land and resources.
- There is a need to streamline the outfitter and guide permit process.
- There is a need to increase local benefits from tourism operations.
- There are conflicting user expectations regarding access to recreational and tourist opportunities.

We urge the Forest Service to incorporate these priorities to ensure the long-term health of the Tongass National Forest and the communities that depend on it. Thank you for your service to our nation's public lands, waters and wildlife, and for considering these recommendations in the revision process.

On behalf of the Alaska Chapter of Backcountry Hunters & Anglers,

A handwritten signature in cursive script that reads "Mary Graves".

Mary Graves
Alaska Chapter Coordinator
(607) 349-1831
glaves@backcountryhunters.org